

Serial No. 09/412,447

- 11 -

Art Unit: 2141

REMARKS

This Amendment is responsive to the Office Action dated May 14, 2003. All rejections and objections of the Examiner are respectfully traversed. Reconsideration is respectfully requested.

At paragraphs 1-36 of the Office Action, the Examiner has again rejected claims 1-54 under 35 U.S.C. 103, citing United States patent number 5,881,241 of Corbin ("Corbin"), in combination with United States patent number 5,802,054 of Bellenger ("Bellenger"). Applicants respectfully traverse this rejection.

Corbin discloses a system for transmitting a data packet after matching the data packet's routing pattern to one of a number of predetermined data routes stored in a route table. The data routing taught by Corbin concerns "routes" for data traveling through the software or hardware of a single computer system. As stated in the first line of the Abstract in Corbin:

Data routing of the present invention is a capability of pre-configuring routes for data traveling through *the software or the hardware of a computer system*. (emphasis added)

The data routes in the system described by Corbin are set up by a consumer (destination) of the data and are delivered to the producer (source) of the data. The data routes in Corbin are described as each including an identification of the consumer of the data, a minimal list of routines which will perform some preprocessing of the data, a return route, a don't care mask, a set of registered routes and a set of actions. Thus the data routes in Corbin describe the actions or functions to be performed on a data packet by a set of routines, and those actions and routines

Serial No. 09/412,447

- 12 -

Art Unit: 2141

are described by the data route associated with a given data packet. When the data in a data packet is determined to "match" one of the predetermined ("registered") data routes in the Corbin system, that data packet is processed in accordance with that registered data route, thus providing an improvement over previous systems which passed each data packet to the same set of layered processing points, regardless of the actions or routines appropriate to that specific data packet. The determination of the actions and functions described by a data route in Corbin, and that are to be applied to a given data packet, is responsive to the data within the data packet.

Bellenger discloses an atomic type switch mesh combined with local area network links and a bridge-like protocol to provide a high performance scalable network switch. The network switch of Bellenger includes switch nodes, communication links between switch nodes, and communication links on the border of the network switch to systems external to the network switch. The switch nodes of Bellenger also include a route table specifying routes through the plurality of switch nodes within the boundaries of the network switch. Frames received by a switch node of the Bellenger switch are monitored to generate identifying tags for use in accessing the route table memory.

Nowhere in the combination of Corbin and Bellenger is there disclosed or suggested any system or method of maintaining a route table in a routing device, the route table storing multiple routes between network devices in a network, that registers a set of routes of the multiple routes between network devices in a network, wherein the set of routes is associated with a routing protocol, and wherein the set of routes is a subset of the multiple routes between the network devices in the network, that determines if any of the routes in the set of routes has changed, and that lists data identifying each route in the set of routes that has been determined to be changed, as in the present independent claims 1, 12, 23, 34 41 and 48. The combination of Corbin and

Serial No. 09/412,447

- 13 -

Art Unit: 2141

Bellenger differs from the presently claimed invention in that the combination of Corbin and Bellenger fails to disclose or suggest any system or method in which a set of registered routes is associated with a routing protocol, and wherein the set of registered routes is a subset of multiple routes maintained in a route table, where the routes in the route table describe routes between network nodes. In contrast, the only data routes maintained by Corbin in the route table are those that are predetermined or registered *by a consumer of the data packets*. The consumer of Corbin is described as a process that acts to store data, while the producer process is one that retrieves data. Corbin only teaches the maintenance of a single set of data routes that are "registered" or "predetermined". If a data packet does not match one of the data routes in that set, that data packet is processed in a way not determined by the data routes in the route table of Corbin. In other words, Corbin describes a route table consisting only of all those data routes that are registered. Accordingly, the single set of routes in the route table of Corbin are associated only with the consumer of the data packets. Moreover, as previously mentioned, the data routes of Corbin describe actions or functions performed between a data producer and a data consumer, and do not represent routes between devices within a communication network.

Bellenger includes no concept of registering any subset of routes for any purpose, far less any suggestion of registering routes associated with a routing protocol that are a subset of the routes stored in the routing table, and for the purpose of determining whether routes in the subset have changed, as in the present independent claims 1, 12, 23, 34, 41 and 48.

For the above reasons, Applicants respectfully urge that the combination of Corbin and Bellenger does not disclose or suggest all the features of the present independent claims 1, 12, 23, 34, 41 and 48. Accordingly, the combination of Corbin and Bellenger does not support a *prima facie* case of obviousness under 35 U.S.C. 103 with regard to the independent claims 1,

Serial No. 09/412,447

- 14 -

Art Unit: 2141

12, 23, 34, 41 and 48. As to the remaining claims, they each depend from claims 1, 12, 23, 34, 41 and 48, and are respectfully believed to be patentable over the combination of Corbin and Bellenger for at least the same reasons. Reconsideration of all pending claims is respectfully requested.

Applicants have made a diligent effort to place the claims in condition for allowance. However, should there remain unresolved issues that require adverse action, it is respectfully requested that the Examiner telephone the undersigned Applicants' Attorney at 978-264-6664 so that such issues may be resolved as expeditiously as possible.

For these reasons, and in view of the above amendments, this application is now considered to be in condition for allowance and such action is earnestly solicited.

Respectfully Submitted,

October 14, 2003  
Date

David A. Dagg  
David A. Dagg, Reg. No. 37,809  
Attorney/Agent for Applicant(s)  
Steubing McGuinness & Manaras LLP  
125 Nagog Park Drive  
Acton, MA 01720  
(978) 264-6664

Docket No. 2204/144 120/024  
dd: 8/14/2003

RECEIVED  
CENTRAL FAX CENTER

OCT 14 2003

OFFICIAL